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Attorney for Defendant  
MIMI WANG

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	CR No(s).CR 11-0804 MMC
Plaintiff,	)	
v.	)	<b>STIPULATION AND [PROPOSED]</b>
MIMI WANG,	)	<b>ORDER CHANGING HEARING DATE</b>
Defendant.	)	

Since the last calling of the case, the parties have engaged in disposition discussions regarding Ms. Wang's case. This continuance is sought by counsel for the defense in order to provide additional time for effective preparation of counsel. Counsel for the defense anticipates reaching a resolution of Ms. Wang's case in the next few weeks. To preserve the Court's time, and to avoid the dislocation for the defendant that travel to Court entails, the parties propose moving the hearing date. Therefore, the parties respectfully request that the Court move the next hearing from March 28, 2012 to April 18, 2012.

No party objects to the requested continuance.

The parties request that the period from March 28, 2012 through April 18, 2012 also be

STIPULATION AND [PROPOSED] ORDER CHANGING HEARING DATE

1 excluded from any time limits applicable under 18 U.S.C. § 3161. The parties agree that  
2 granting the exclusion would allow the reasonable time necessary for effective preparation of  
3 counsel and would preserve continuity of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The  
4 parties also agree that the ends of justice served by granting such an exclusion of time outweigh  
5 the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).  
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8 SO STIPULATED:  
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11 DATED: March 26, 2012

\_\_\_\_\_  
/s/

JOHN RUNFOLA  
Attorney for CARL PITTS

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14 DATED: March 26, 2012

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/s/

DAMALI TAYLOR  
Assistant United States Attorney

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17 ~~PROPOSED~~ ORDER

18 For the reasons stated above, the Court finds good cause to change the date for the next  
19 hearing from March 28, 2012 to April 18, 2012. The Court also finds that the exclusion from the  
20 time limits applicable under 18 U.S.C. § 3161 of the period from March 28, 2012 through April  
21 18, 2012 is warranted and that the ends of justice served by the continuance outweigh the best  
22 interests of the public and the defendant in a speedy trial. 18 U.S.C. §3161(h)(7)(A). The failure  
23 to grant the requested exclusion of time would deny counsel for the defendant and for the  
24 government the reasonable time necessary for effective preparation, taking into account the  
25 exercise of due diligence, and would result in a miscarriage of justice. 18 U.S.C.  
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1 §3161(h)(7)(B)(iv).

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3 IT IS SO ORDERED.

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5 DATED: March 27, 2012

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7 THE HONORABLE JUDGE MAXINE CHESNEY  
8 United States District Judge  
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